

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF RHODE ISLAND**

**DOLORES CEPEDA**

**VS**

**C.A.2019-CV-5**

**BANK OF AMERICA, N.A.  
FAY SERVICING, LLC  
WILMINGTON TRUST NATIONAL ASSOCIATION  
SOLEY AS TRUSTEE FOR THE MFRA TRUST 2014-2 , ALIAS**

**STATEMENT OF DISPUTED FACTS**

Defendant, by her attorney, pursuant to DRI LR56(a) submits the following Statement of Disputed facts in support of her Objection to Plaintiff's Motion for Summary Judgment.

1. Admitted that Fay is the loan servicer. Denied that Wilmington Trust is the holder by assignment of the note and the mortgage. See Exhibit D, which indicates that Bank of America as Creditor for Bank of America California, N.A. was the owner of the mortgage loan on August 14, 2017 and Bank of America, N.A. was not the owner of the loan.
2. Admitted
3. Disputed. See Affidavit of Plaintiff. See Defendant's Exhibit D. Ssee answer to Paragraph 114 of Plaintiff's complaint.
4. Admitted
5. Admitted

6. Disputed. See Cepeda Affidavit. This letter was not a default letter.
7. Disputed. See Cepeda Affidavit, Exhibit D, letter from Bank of America dated August 14, 2017.
8. Admit
9. Disputed. See Affidavit of Plaintiff. This letter was not a default letter.
10. Disputed. See Cepeda Affidavit. The letter was not mailed on September 26, 2018. See Exhibit E and E-1.
11. Disputed that this letter was a valid Notice of Sale. See Cepeda Affidavit and Exhibits E, E-1 D, B and C.
12. Admitted that statements were mailed. Disputed that they were accurate. See Cepeda Affidavit.

DOLORES CEPEDA

By her attorney,

October 28, 2019

/s/ John B. Ennis  
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**Certificate of Service**

I hereby certify that I emailed a copy of this Statement of Disputed Facts to Patrick T. Uiterwyk and Justin Shireman on October 28, 2019 and by electronic filing.

/s/ John B. Ennis